

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-CR-181
	:	
	:	
	:	
v.	:	VIOLATIONS:
	:	
	:	2 U.S.C. §§ 441b(a), 437g(d)(1)(A)(ii)
	:	(Unlawful Corporate Contributions)
STANLEY L. STRAUGHTER,	:	
	:	
Defendant.	:	18 U.S.C. § 2 (Aiding and Abetting and
	:	Causing an Act to be Done)

STATEMENT OF THE OFFENSE

Pursuant to Rule 11 of the Federal Rules of Criminal Procedure, defendant STANLEY L. STRAUGHTER and the United States agree and stipulate that at all relevant times:

Individuals and Entities

1. Defendant Stanley L. Straughter ("STRAUGHTER"), a resident of the Commonwealth of Pennsylvania, was the owner and operator of Oak Lane Consulting Group, Inc. ("OAK LANE"), a for-profit corporation based in Philadelphia, Pennsylvania.
2. OAK LANE provided marketing and consulting services as an independent contractor to COMPANY A, a for-profit corporation registered in the District of Columbia that provided accounting, management consulting, and tax services.
3. EXECUTIVE A, a resident of the District of Columbia, was a named partner, the Chairman and Chief Executive Officer, and the majority owner of COMPANY A. EXECUTIVE A worked at COMPANY A's main office in the District of Columbia.

The Unlawful Corporate Contributions

4. EXECUTIVE A and COMPANY A raised money and held fundraisers for several political candidates and committees, as well as multi-candidate political action committees (or "PACs").

5. Beginning in or about January 2006 and continuing until in or about February 2012, in the District of Columbia and elsewhere, defendant STRAUGHTER, at the direction of EXECUTIVE A, used his name and the names of his family members to conceal campaign contributions made by COMPANY A to federal, state, local, District of Columbia, and other political campaign committees and PACs. STRAUGHTER also used the name of OAK LANE to conceal campaign contributions made by COMPANY A to political campaign committees in non-federal elections that allowed corporate contributions. Specifically, STRAUGHTER, at the direction of EXECUTIVE A and others acting on EXECUTIVE A's behalf, caused political contributions by COMPANY A to be made in the names of STRAUGHTER, his relatives, and OAK LANE, knowing that STRAUGHTER and OAK LANE would be reimbursed for the contributions by EXECUTIVE A and COMPANY A with COMPANY A's funds.

6. Defendant STRAUGHTER read, understood, and signed several campaign donor forms that expressly described campaign finance restrictions, including, the applicable contribution limits and the requirement that contributions be made from a donor's personal funds. STRAUGHTER also read, understood, and signed several campaign donor forms for candidates in federal elections, which expressly described the prohibition against corporate contributions. STRAUGHTER knew that it was illegal to be reimbursed for contributions that he made in his name, his relatives' names, and OAK LANE's name, because STRAUGHTER

knew that COMPANY A was the real contributor. STRAUGHTER, personally and on behalf of OAK LANE, knowingly accepted unlawful corporate reimbursement payments for numerous political campaign contributions from COMPANY A.

7. During the calendar years 2007 through 2012, as set forth in the table below, defendant STRAUGHTER, at the direction of EXECUTIVE A and others acting on EXECUTIVE A's behalf, caused at least \$58,600 in federal political contributions from COMPANY A to be made in STRAUGHTER's name and his relatives' names, including contributions to PACs and the campaign committees of candidates who were running for President of the United States, United States Senate, and United States House of Representatives:

Year	Straughter's Conduit Federal Contributions
2007	\$11,500
2008	\$16,900
2009	\$7,200
2010	\$8,600
2011	\$6,900
2012	\$7,500
Total	\$58,600

8. Through this scheme, EXECUTIVE A, COMPANY A, defendant STRAUGHTER and others caused various campaigns and PACs to file reports with the Federal Election Commission ("FEC") falsely stating that STRAUGHTER and his relatives had made federal campaign contributions, when in truth and in fact, the contributions were made by COMPANY A at EXECUTIVE A's direction. These reports were materially false as they concealed from the FEC that COMPANY A was the true source of these unlawful federal campaign contributions.

9. During the calendar years 2006 through 2011, as set forth in the table below, at the direction of EXECUTIVE A and others acting on EXECUTIVE A's behalf, defendant STRAUGHTER caused at least \$49,000 in District of Columbia political contributions from COMPANY A to be made in the names of STRAUGHTER, his relatives, and OAK LANE, including contributions to the campaign committees of candidates running for Mayor and Council of the District of Columbia, among other elected offices:

Year	Straughter's Conduit D.C. Contributions
2006	\$8,500
2007	\$2,500
2008	\$4,500
2009	\$9,500
2010	\$20,000
2011	\$4,000
Total	\$49,000

10. During the calendar years 2007 through 2011, defendant STRAUGHTER, at EXECUTIVE A's direction, also used his name, his relatives' names, and the name of OAK LANE to conceal more than \$25,000 in campaign contributions made by COMPANY A to local and state political candidates and campaigns in other states and United States territories, for which EXECUTIVE A caused COMPANY A to reimburse STRAUGHTER and OAK LANE.

11. Defendant STRAUGHTER engaged in the conduct described above knowingly, corruptly, and willfully, and not by accident, mistake, or other innocent reason.

This statement of the offense is not intended to constitute a complete recitation of all facts known by the United States or defendant STRAUGHTER, but is, instead, intended to provide the necessary factual basis for the guilty plea.

RONALD C. MACHEN JR.
United States Attorney
D.C. Bar No. 447-889

By:

Loyaan A. Egal, New York Bar
Ephraim (Fry) Wernick, D.C. Bar No. 497-158
Assistant United States Attorneys
United States Attorney's Office
555 Fourth Street, N.W.
Washington, DC 20530
loyaan.egal@usdoj.gov
ephraim.wernick@usdoj.gov
(202) 252-7899 (AUSA Egal)
(202) 252-7092 (AUSA Wernick)